STATE OF MISSOURI
Mel Carnahan, Governor • David A. Shorr, Director
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
Southwest Regional Office
318 Park Central East, Suite 500 Springfield, MO 65806-2218
(417)895-6950
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Laclede County/HzW
General

September 15, 1994

Mr. Bill Kronmueller
Plant Metallurgist & Chemist
Copeland Corporation
P.O. Box 1152
Lebanon, MO 65536

Dear Mr. Kronmueller:

Please find enclosed a copy of the Hazardous Waste Compliance Evaluation Inspection Report for the Copeland Corporation facility located in Lebanon, Missouri.

The report, issued as a result of the September 8, 1994 hazardous waste compliance inspection, is believed to be self-explanatory. Should you have any questions regarding the report, contact Mark Rader of this office.

Sincerely,

SOUTHWEST REGIONAL OFFICE

R. Bruce Martin
Regional Director

RBM:MR

enc.

c: Ms. Kathy Flippin, HWMP, Enforcement

RESOURCE CONSERVATION AND RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT
SEPTEMBER 15, 1994

FACILITY:

Copeland Corporation
P.O. Box 1152
Lebanon, MO 65536
(417) 588-8600

EPA ID: MOD985775733
MO ID: 013991
RR ID: NONE

PARTICIPANTS:

Department of Natural Resources	Mark Rader Environmental Specialist
	Charles L. Kroeger Environmental Specialist
Copeland Corporation	Bill Kronmueller Plant Metallurgist & Chemist

INTRODUCTION:

On September 8, 1994 Mark Rader and Charles L. Kroeger of the Missouri Department of Natural Resources' Southwest Regional Office conducted a hazardous waste compliance inspection at the Copeland Corporation facility in Lebanon, Missouri.

The purpose of the inspection was to determine the facility's compliance with the Missouri Hazardous Waste Management Law and Regulations. The inspection was conducted under authority of Sections 260.375(9) and 260.377 RSMo.

The department representatives met with Mr. Bill Kronmueller, and detailed the scope and intent of the inspection. Mr. Kronmueller described processes relating to the generation of hazardous waste at the facility and provided the necessary paperwork for review. Mr. Kronmueller also led the inspectors on a tour of the facility to examine production processes and waste generation, accumulation and storage areas.

FACILITY DESCRIPTION:

Copeland Corporation is registered with the department as a large quantity generator of hazardous waste. The facility has been in operation at the Lebanon site since March of 1992 and has approximately 280 employees.

The facility manufactures heating, ventilation and air conditioning unit compressors. The facility does not manufacture the refrigeration units, but assembles and wholesales the final unit.

Raw steel is brought into the facility, stamped, machined and assembled. Cast iron castings are performed. The outer shells are painted in a powder paint operation. Metal preparation is through an iron phosphatizing wash which does not contain zinc or chrome.

Wastes generated include a sodium hydroxide waste generated from a rust removal wash. The material is continually reused in the unit until the facility schedules disposal. The transporter removes the waste directly from the operating unit via pump into the transporting vehicle. No accumulation or storage containers are utilized for this waste stream.

Cutting oils, synthetic soaps/coolants and mineral oils are accumulated into a Henry filtration unit. Metal fines are recycled, oils and waters are accumulated for disposal with Safety-Kleen Corporation.

The facility maintains a piping network in the basement to collect any leaks from the coolant system. The coolant is accumulated in large totes and disposed with Safety-Kleen.

The facility cleans parts in a Lubrite II process which includes a mild acid wash. The solution is continually filtered and the filters and filtered materials have been tested as nonhazardous. The acid wash itself is not disposed, but additional materials are routinely added.

The only wastes the facility stores are used oils, synthetic soaps and coolants. Regulated hazardous wastes are only present at the facility on the day that the transporter arrives to remove the waste from the rust removal unit.

The facility has Dames & Moore out of St. Louis under contract for preparation of a contingency plan which will address hazardous wastes. Personnel training was scheduled for the afternoon of the inspection and includes sections on spill response and cleanup.

UNSATISFACTORY FEATURES AND RECOMMENDATIONS:

NONE

Submitted By:

Mark Rader
Environmental Specialist

Approved By:

Charles L. Kroeger
Environmental Specialist

MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
LARGE QUANTITY GENERATOR

INSPECTION RECORD AND CHECKLIST

L

LQG-INSP.

FOR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME		DATE	EPA I.D. NUMBER
Copeland Corporation		Sept 8, 1994	MOD985775733
ADDRESS		RR NO.	MO I.D. NUMBER
P.O. Box 1152	Highway 32 East	N/A	013991
CITY	NUMBER OF EMPLOYEES	YEARS AT SITE	TELEPHONE NUMBER
Lebanon 65536	280	Mar 92	417-588-8600

FACILITY REPRESENTATIVE(S), TITLE(S)
Bill Kronmueller Plant Metallurgist & Chemist

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT.

Facility Manufactures HVAC air Conditioning Unit ~~Pumps~~ Compressors
do not make Refrigeration units themselves / wholesale to a/c Manufact
take raw steel - Stamp / cast iron Castings
Machining and assemble Compressors
purchase most parts for assembly
powder paint exterior shells
Metal preperation is an iron phospletizing wash (no zinc or chrome)

WASTE STREAMS

	DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1.	RQ Waste Sodium Hydroxide Solution	1100 gal per cleanout	D002 D008	Laidlaw
2.	Waste Oils / coolants			SK
3.				
4.				
5.				

CHECK ALL THAT APPLY (Specify if possible)

- ☐ NPDES Permit
- ☐ Septic Tank
- ☐ Air Permit
- ☐ Lead/Acid Batteries
- ☐ H.W. Burner/Blender/Marketer
- ☐ Precious Metal Reclamation
- ☐ POTW _____
- ☐ Solid Waste Landfill _____
- ☐ Waste Water Pretreatment

A. GENERAL

1.	☑	**Registered as a HW Generator** - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)	GGR
2.	☑	**Facility determines if waste is hazardous** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR
3.	☑	**Utilizes a licensed hazardous waste transporter** - Section 260.380.1 (5) RSMo	GGR
4.	☑	**Utilizes authorized HW TSD or RR facility** - Section 260.380.1(7) RSMo	GGR
5.	☑	**Facility does not operate as a TSD** - Section 260.390(1) RSMo	GGR

COMMENTS

PART 1: WALK-THROUGH INSPECTION

B. PRETRANSPORT, CONTAINERIZATION & STORAGE

1.	NA	**Storage does not exceed 90 days or 180/270 days if facility generates** < 1000 Kg/month - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)	GPT
2.	☐	**Containers in good condition** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.171	GPT
3.	☐	**Waste compatible with container** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172	GPT
4.	☐	**Containers closed in storage** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a)	GPT
5.	☐	**Containers storing incompatible waste separated or protected from each other by a dike, berm or wall** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c)	GPT
6.	☐	**Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste** - 10 CSR 25-5.262 (2)(C)2.B.(I)	GOR
7.	☐	**Base of containment system is impervious and free of cracks or gaps** - 10 CSR 25-5.262 (2)(C)2.B.(III)(a).	GOR
8.	☐	**Containers protected from contact with accumulated liquids** - 10 CSR 25-5.262(2)(C)2.B.(III)(b).	GOR
9.	☐	**Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater** - 10 CSR 25-5.262(2)(C)2.B.(III)(c).	GOR
10.	☐	**Run-on onto the containment system is prevented or excess capacity is provided** - 10 CSR 25-5.262(2)(C)2.B.(III)(d).	GOR
11.	☐	**Accumulated liquids removed to prevent overflow of containment** - 10 CSR 25-5.262(2)(C)2.B.(III)(e).	GOR
12.	☐	**Containers of ignitable or reactive waste stored >50 ft. from property line (or meet requirements)** - 10 CSR 25-5.262(2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)7.and 8.	GPT
13.	☑	**Containers clearly marked "hazardous waste"** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)	GPT
14.	☐	**Waste packaged/labeled/marked per DOT during entire on-site storage period** - 10 CSR 25-5.262(2)(C)1.	GOR
15.	☐	**Date of accumulation marked on containers** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2)	GPT
16.	☑	**Facility inspected and maintained (weekly)** - 10 CSR 25-5.262(2)(C)2.A.(I) and (II) referencing 40 CFR 265.174	GPT
17.	☑	**Daily inspection of areas subject to spills, i.e., waste handling areas** - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR
18.	NA	**Adequate aisle space is available** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35	GPT
19.	☑	**Placards available for transporter** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT
20.	NA	**"No Smoking" signs conspicuously placed by ignitable or reactive wastes** - 10 CSR 25-5.262(2)(C)2.D(II)	GOR
21.	☑	**Waste oil containers in good condition, labeled and closed** - 10 CSR 25-11.010(3)(C)	GOR

COMMENTS

facility does not accumulate or store waste. Waste B generated from NAOH Rust Remover. NAOH stays in tank for use until Laidlaw backs in truck and pumps directly out of unit. Have shipped twice

C. SATELLITE ACCUMULATION

1.	NA	**Containers kept closed** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a)	GPT

COMMENTS

2. ☐ **Containers in good condition** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171	GPT	**COMMENTS** NO Satellite accumulation
3. ☐ **Waste compatible with container** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172	GPT	
4. ☐ **Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes)** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT	
5. ☐ **Satellite containers go to storage within 3 days of filling** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2).	GPT	
6. ☐ **Container marked identifying contents & beginning date** - 10 CSR 25-5.262(2)(C)3.	GOR	
7. ☐ **Stored in satellite areas less than 1 year** - 10 CSR 25-5.262(2)(C)3.	GOR	

D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. ☑ **Facility operated and maintained to minimize the possibility of an emergency** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.31	GPT	**COMMENTS**
2. ☑ **Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.)** - 10 CSR 25-5.262 (2)(C)2.E.	GPT	
3. ☑ **Adequate water supply and fire control equipment** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d)	GPT	city water
4. ☑ **Device in the hazardous waste operation area capable of summoning emergency assistance** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a)	GPT	
5. ☑ **Telephone or two-way radio on-site and capable of summoning local fire or police department** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b)	GPT	911
6. ☑ **Communication and emergency equipment tested and maintained** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33	GPT	

E. LQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.				
3. N/A				
4.				
5.				

1. ☐ **Spill prevention controls in place and operating e.g. check valves, dry discount couplings** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(1)	GPT	**COMMENTS**
2. ☐ **Overfill prevention controls in place and operating e.g. high level alarms, automatic feed cutoff, etc.** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(2)	GPT	
3. ☐ **Sufficient freeboard in uncovered tanks to prevent overtopping** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(3)	GPT	
4. ☐ **Waste or treatment method compatible with tank** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(a)	GPT	
5. ☐ **Incompatible wastes not placed in same tank** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.199(a)	GPT	
6. ☐ **Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(a)(1) and (2)	GPT	
7. ☐ **Ignitable or reactive wastes treated/stored in accordance with NFPA's buffer zone requirements** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(b)	GPT	

8. ☐	**Volatiles with vapor pressure > 78 mm @ 25° C not placed in open tanks** - 10 CSR 25-5.262(2)(C)2.D.(I)	GOR
9. ☐	**Wastes and residues removed as hazardous waste and tank and equipment decontaminated upon closure** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.197(a)	GPT
10. ☐	**Secondary containment system provided for tanks and equipment; installed after July 14, 1986; storing dioxin waste; over 15 years old; of unknown age in facility over 15 years old; repaired, replaced or reinstalled after July 14, 1986** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)	GPT
11. ☐	**Secondary containment system constructed of or lined with impervious waste compatible material** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(1)	GPT
12. ☐	**Containment system supported by base capable of preventing failure due to settlement, compression or uplift** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(2)	GPT
13. ☐	**Containment system provided with a leak detection system capable of detecting a release within 24 hours** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(3)	GPT
14. ☐	**Containment system sloped or designed to drain and remove liquids** - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(b)	GOR
15. ☐	**Containment system capable of containing 100% of the capacity of the largest tank** - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(c)	GOR
16. ☐	**Containment system free of cracks or gaps** - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B. (III)(a)	GOR
17. ☐	**Run-on onto containment system prevented or excess capacity is provided** - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(d)	GOR
18. ☐	**Spilled or leaked waste and precipitation removed from secondary containment within 24 hours or as soon as possible** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(4)	GPT
19. ☐	**Tanks are clearly labeled or marked "Hazardous Waste"** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)	GPT
20. ☐	**Daily inspections of overfill/spill control equipment, aboveground portions of tank system, secondary containment, and data gathered from monitoring equipment** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(a)	GPT
21. ☐	**Inspection log maintained** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(c)	GPT
22. ☐	**Cathodic protection systems inspected annually, impressed current sources every two months** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(b)	GPT
23. ☐	**Detailed written assessment by an independent, qualified, professional engineer for tanks installed after July 14, 1986, prepared and on-site** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.192	GPT
24. ☐	**Written assessment by an independent, qualified, professional engineer prepared and on-site for tanks lacking secondary containment** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191	GPT
25. ☐	**Leak test, internal inspection or tank integrity exam performed annually and documented, by an independent, qualified, professional engineer for tanks lacking secondary containment** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(i)	GPT
26. ☐	**Leak/spill response resulted in: waste flow stopped immediately; waste removal; containment and removal of visible releases to the environment; notification and report; and repair or closure** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.196	GPT

COMMENTS

PART 2: RECORDS INSPECTION

F. MANIFESTS

1. ☑	**Facility uses manifest system** - 260.380.1.(6) RSMo, and 10 CSR 25-5.262(2)(B)	GMR
2. ☑	**Records maintained for a 3-year period** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR
3. ☑	**Generator's MO & EPA I.D. Numbers** - 10 CSR 25-5.262(2)(B)	GOR
4. ☑	**Manifest document, ID and consecutive shipment numbers** - 10 CSR 25-5.262(2)(B)2.A.	GOR
5. ☑	**Generator's name, address and phone number** - 10 CSR 25-5.262(2)(B)2.	GMR
6. ☑	**All transporters' names, phone numbers, MO & EPA I.D.#'s, license plate #** - 10 CSR 25-5.262(2)(B)2.	GMR
7. ☑	**Designated facility name, address, phone, MO & EPA I.D. #,** - 10 CSR 25-5.262(2)(B)2.	GMR
8. ☑	**DOT shipping name, Hazard Class and waste I.D. # (RQ - if required)** - 10 CSR 25-5.262(2)(B)2.	GMR
9. ☑	**Containers, quantity and specific gravity designated** - 10 CSR 25-5.262(2)(B)2.	GMR
10. ☑	**Manifest signed and dated** - 10 CSR 25-5.262(2)(B)2.	GMR
11. ☑	**Out of state manifests have all required MO information** - 10 CSR 25-5.262(2)(B)4.A.	GOR
12. ☑ NA	**Manifest continuation sheets are not used** - 10 CSR 25-5.262(2)(B)1.	GOR
13. NA	**Manifest returned within 35 days - or exception report submitted within 45 days** - 10 CSR 25-5.262(2)(D)2.C.	GRR
14. ☑	**Summary Manifest Reports and manifest copies sent to DNR quarterly** - 10 CSR 25-5.262(2)(D)1.	GOR

COMMENTS

1755 gallons to LaidLaw - 1st shipme.
Spec. Grav. 1.22
2nd Shipment had not received back manifest. with exact quantity. 9-1-94 question as to whether D008 since 13ppm lead. Do not know where lead would have come from in process.

G. LAND DISPOSAL RESTRICTIONS

1. ☑	**Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
2. NA	**Dilution of waste to meet LDR treatment standards is not occurring** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a)	GLB
3. NA	**"Land-Ban" notification/certification, sent with manifests and retained on-site for five years** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
4. NA	**Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
5. NA	**Waste analysis plan on-site and utilized if generator treats hazardous waste in tanks or containers to meet LDR treatment standards** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)(4)	GLB

COMMENTS

H. PERSONNEL TRAINING

1. ☑	**Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).	GPT
2. ☑	**Employees do not work in unsupervised positions until they have completed the training** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b)	GPT
3. ☑	**Training reviewed annually** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c)	GPT
4. ☑	**Program director trained in hazardous waste management procedures** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2)	GPT
5. ☑	**Personnel training plan on-site** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)	GPT

COMMENTS

personell receive Hazwoper type training no waste on site. did not check.

6. ☐	**Gives job title, job description and name of employee filling each position** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) and (2)	GPT	**COMMENTS**
7. ☐	**Written description of introductory and continuing training that will be given to each position** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3)	GPT	
8. ☑	**Documentation of training completed by personnel** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4)	GPT	
9. ☐	**Records of current personnel maintained until facility closure, former employee records maintained for at least three years** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e)	GPT	

I. CONTINGENCY PLAN

1. ☐ NA	**Contingency plan maintained on-site** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a).	GPT	**COMMENTS** facility has contracted with Dames + Moore to develop Contingency Plan. No waste on site at facility.
2. ☐	**Plan submitted to local emergency response agencies** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b)	GPT	
3. ☐	**Emergency coordinator on-site or on call** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55	GPT	
4. ☐	**Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a)	GPT	
5. ☐	**Describes arrangements with emergency response agencies** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c)	GPT	
6. ☑	**Lists names, addresses and phone numbers (home and office) of emergency coordinators** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	GPT	
7. ☐	**Primary emergency coordinator designated** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	GPT	
8. ☐	**List emergency equipment including description, location and capabilities** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e)	GPT	
9. ☐	**Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f)	GPT	

J. WASTE OIL

1. ☑	**Waste oil is managed properly and not disposed of into the environment** - 10 CSR 25-11.010(1)(D).	GOR	**COMMENTS** Accumulate in totes in basement from filter system
2. ☐ NA	**Listed hazardous waste mixed with waste oil is handled as a hazardous waste** - 10 CSR 25-11.010(1)(C)2.	GOR	
3. ☑	**Registered as waste oil generator if gen./accum. 220 lb.** - 10 CSR 25-11.010(2)(A)	GOR	
4. ☑	**Written waste oil contract maintained** - 10 CSR 25-11.010(4)(C)	GOR	
5. ☑	**Uses a licensed transorter and receiving facility** - 10 CSR 25-11.010(4)	GOR	

K. RESOURCE RECOVERY

1. ☐ NA	**RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site** - 10 CSR 25-9.020(1)(A)3.	GOR	**COMMENTS**
2. ☑	**Still bottoms or RR residues disposed of properly** - Section 260.380.1(5) RSMo.	GOR	
3. ☐	**Facility is classified as U, R1 or R2 accurately** - 10 CSR 25-9.020(3)(A).	GOR	
4. ☐	**Facility meets the operating conditions of certification** - 10 CSR 25-9.020(30)(E)3.	GOR	
5. ☑	**Facility has submitted a written request and received approval from the DNR for all changes in operation including closure** - 10 CSR 25-9.020(3)(E) 1. and 2.	GOR	

6. ☒ **Facility report submitted to DNR quarterly** - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR	**COMMENTS**
7. ☐ **Facility maintains a written operating record** - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) & (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR	
8. ☐ **Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site** - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR	
9. ☐ **R2 facility uses an adequate sampling and analysis plan to assess incoming shipments** - 10 CSR 25-9.020(3)(C)1.	GOR	
10. ☐ **R2 facility maintains a daily log of manifest number, wastes received, disposition of waste and corresponding sampling data** - 10 CSR 25-9.020(3)(C)2.	GOR	
11. ☐ **R2 facility has a written closure plan which meets 40 CFR 264.112 requirements** - 10 CSR 25-9.020(3)(C)3.	GOR	
12. ☐ **R2 facility provides financial assurance for closure** - 10 CSR 25-9.020(3)(C)4.	GOR	

CHECKLIST KEY

Check the ☑ if in compliance.

Circle the ◯ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

INSPECTOR'S SIGNATURE	DATE
Mark Roberson	9-8-94